

1 DANIEL G. BOGDEN  
United States Attorney  
2 JAMES E. KELLER  
Assistant United States Attorney  
3 100 West Liberty Street, Suite 600  
Reno, NV 89501  
4 (775) 784-5438  
James.Keller3@usdoj.gov

5 ARTHUR G. WYATT  
6 Chief  
7 KAREN P. SEIFERT  
Trial Attorney  
Narcotic & Dangerous Drug Section  
8 U.S. Department of Justice  
145 N Street, Northeast, East Wing, Second Floor  
9 Washington, D.C. 20530  
(202) 514-0917  
10 Karen.Seifert@usdoj.gov  
Attorneys for Plaintiff

11  
12 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,  
14 Plaintiff,

Case No. 2:15-CR-00285-APG-PAL

MOTION TO ADMIT GOVERNMENT  
ATTORNEY (CHARLES MIRACLE)

15 v.

16 CHARLES BURTON RITCHIE,  
a/k/a Burton Ritchie,  
17 BENJAMIN GALECKI,  
a/k/a Zencense Ben,  
18 and  
RYAN MATTHEW EATON,  
a/k/a Zencense Ryan,

19 Defendants.

20  
21  
22 COMES NOW, the United States of America, by and through its attorneys, DANIEL G.  
23 BOGDEN, United States Attorney for the District of Nevada, and ARTHUR G. WYATT, Chief,  
24 Narcotic and Dangerous Drug Section, Criminal Division, and pursuant to LR IA-11-3, and hereby

1 moves for the admission of Trial Attorney Charles Miracle to the Bar of this Court for the purpose of  
2 representing the United States of America, its political subdivisions, officers, and employees, in the  
3 above identified case or any related cases. It is anticipated that Trial Attorney Miracle will enter an  
4 appearance in this action on behalf of the United States. Mr. Miracle is currently a Trial Attorney with  
5 the Narcotic and Dangerous Drug Section (NDDS), United States Department of Justice. NDDS is  
6 prosecuting this case jointly with the United States Attorney's Office, District of Nevada. Trial Attorney  
7 Miracle is specifically working with Assistant United States Attorney James Keller and Trial Attorney  
8 Karen Seifert on the above-identified case. Trial Attorney Miracle is substituting as counsel for Trial  
9 Attorney Brian Sardelli.

10 Trial Attorney Miracle has been a licensed attorney since 1997. Trial Attorney Miracle is a  
11 member in good standing of the Ohio Bar. Since 2013, Trial Attorney Miracle has been an attorney  
12 employed by NDDS, and his office is located in Washington, D.C. Mr. Miracle has been with the United  
13 States Department of Justice since 2007, also working as an Attorney Advisor in the Professional  
14 Responsibility Advisory Office. Mr. Miracle was an officer and Judge Advocate in the United States  
15 Marine Corps from 1997-2007. Mr. Miracle was a law clerk to the Honorable Ralph Winkler, Hamilton  
16 County, Ohio, Court of Common Pleas from 1993-1997.

17 LR IA 11-3 provides that, “[u]nless otherwise ordered by the Court, any nonresident attorney  
18 who is a member in good standing of the highest court of any state, commonwealth, territory or the  
19 District of Columbia, who is employed by the United States as an attorney and, while being so employed,  
20 has occasion to appear in this Court on behalf of the United States, shall, upon motion of the United  
21 States Attorney or the Federal Public Defender for this District or one of the assistants, be permitted to  
22 practice before this Court during the period of such employment.”

23  
24

1 It is respectfully requested that an Order be issued permitting Trial Attorney Miracle to practice  
2 before this Court during the period of his employment by the United States as an attorney. It is  
3 anticipated that Mr. Miracle will enter an appearance in this action on behalf of the United States.

4 DATED: January 9, 2017  
5

6 Respectfully submitted,  
7

8 DANIEL G. BOGDEN  
9 United States Attorney  
10

11 JAMES E. KELLER  
12 Assistant United States Attorney  
13

14 ARTHUR G. WYATT  
15 Chief, Narcotic and Dangerous Drug Section  
16

17 /s/ Karen P. Seifert  
18 KAREN P. SEIFERT  
19 Trial Attorney  
20

21 IT IS SO ORDERED:  
22   
23

24 UNITED STATES DISTRICT JUDGE

25 DATED: January 20, 2017